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October 9, 2015

Via ECF

Honorable Stuart M. Bernstein
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004

Re: Picard v. Glantz et al., Adv. Pro. No. 10-5394 (SMB)

Dear Judge Bernstein:

Our office represents the defendants in the above-referenced adversary proceeding in the Madoff matter. I respectfully write to request permission to file a twenty-six pages long reply brief on behalf of the defendants in further support of their motion to dismiss the Trustee's amended complaint. The current deadline for defendants to file their reply papers is October 9, 2015.

We are making this request because the Trustee's memorandum of law in opposition to the motion to dismiss is sixty pages long and presents numerous factual and legal arguments which cannot be adequately addressed in a reply brief within the twenty-page limit provided by the Court's Chambers Rules.¹ Most notably, the Trustee raises numerous arguments concerning defendants' alleged "actual knowledge" that call for extensive, detailed analyses of the factual allegations in the complaint and the relevant caselaw, including the Court's recent decision in Picard v. Ceretti, 2015 Bankr. LEXIS 2674 (Bankr. S.D.N.Y. Aug. 11, 2015).

¹The Trustee's memorandum of law was filed with the Court's permission to exceed the forty-page limit provided by the Court's Chamber Rules.

The Trustee's counsel consents to this request. Thank you for Your Honor's consideration of this request.

Respectfully submitted,

/s/ Richard E. Signorelli

Richard E. Signorelli

cc: Andrew Reich (via e-mail: areich@bakerlaw.com)